

Richard I. Hutson, Esq. (VSB No. 71097)  
FULLERTON & KNOWLES, P.C.  
12642 Chapel Rd.  
Clifton, VA 20124  
(703) 818-2602

Matthew Righetti, Esq. (SBN 121012)  
Admitted *Pro Hac Vice*  
Michael Righetti, Esq. (SBN 258541)  
RIGHETTI LAW FIRM, P.C.  
456 Montgomery Street, Suite 1400  
San Francisco, CA 94104  
(415) 983-0900

Counsel for Creditors Jonathon Card, Jack Hernandez, Robert Gentry, Joseph Skaf and all other persons similarly situated to each.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

-----X  
In re: : Chapter 11  
:   
CIRCUIT CITY STORES, INC., et al., : Case No. 08-35653 (KPH)  
:   
Debtors. :   
: Jointly Administered  
-----X

**MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL  
BANKRUPTCY RULE 2090-1(E)(2)**

COMES NOW THE MOVANT, Richard Hutson (the “Movant”), a member in good standing of the bar of the Supreme Court of Virginia, and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”), and an associate of Fullerton & Knowles, PC, and hereby moves (the “Motion”) this Court to enter an order authorizing Michael Righetti of The Righetti Law Firm, P.C., to appear *pro hac vice* before this Court to represent Creditors Jonathon Card, Jack Hernandez, Robert Gentry, Joseph Skaf and all other persons similarly situated to each in the above-captioned chapter 11 bankruptcy cases

pursuant to Rule 2090-1(E)(2) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”). In support of the Motion, the Movant states as follows:

1. Michael Righetti is an attorney employed by the Righetti Law Firm, P.C.
2. Mr. Righetti is admitted to practice and in good standing as a member of the bar of the State of California. Among other courts, he is admitted to practice in the United States District Court for the Northern District of California.
3. Mr. Righetti has been practicing law since 2008 and has not been reprimanded in any court nor has there been any action in any court pertaining to Mr. Righetti’s conduct or fitness as a member of any bar.
4. Mr. Righetti hereby certifies that, within 90 days before the submission of this application, he has read the Local Rules of this Court and that his knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.
5. The Movant hereby requests that this Court grant this Motion and that Mr. Righetti be admitted to appear before this Court *pro hac vice*.
6. It is understood that admission *pro hac vice* does not constitute formal admission to the bar of the United States District Court for the Eastern District of Virginia.

#### **WAIVER OF MEMORANDUM OF LAW**

7. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant request that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

**WHEREFORE**, the Movant respectfully requests that this Court enter an order, substantially in the form attached hereto as Exhibit "A," (i) authorizing Michael Righetti to appear *pro hac vice* in association with the Movant as attorneys for Creditors Jonathon Card, Jack Hernandez, Robert Gentry, Joseph Skaf and all other persons similarly situated to each and (ii) granting such other and further relief as is just and proper.

Dated: January 11, 2010

Respectfully submitted,

/s/ Richard Hutson

Richard I. Hutson, Esq. (VSB No. 71097)

FULLERTON & KNOWLES, P.C.

12642 Chapel Rd.

Clifton, VA 20124

(703)818-2600

Fax (703) 818-2602

[rhutson@fullertonlaw.com](mailto:rhutson@fullertonlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion and proposed order were filed on March 10, 2010 using the Court's CM/ECF system and thereby served electronically upon all registered users of the ECF system that have filed a 2002 notice of appearance in this matter, and served upon the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders, via regular US mail, first class, postage prepaid, as required by the Case Management Order.

/s/ Richard I. Hutson

Richard I. Hutson, Esq.

**“EXHIBIT A”**

Richard I. Hutson, Esq. (VSB No. 71097)  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
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In re:	:
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CIRCUIT CITY STORES, INC., et al.,	:
	:
Debtors.	:
	:
-----X	

Chapter 11  
Case No. 08-35653  
Jointly Administered

**ORDER GRANTING MOTION TO APPEAR PRO HAC VICE PURSUANT TO  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

THIS MATTER having come before the Court upon the Motion to Appear Pro Hac Vice Pursuant to Local Bankruptcy Rule 2090-1(E)(2) (the “Motion”) of Richard Hutson, associate with the law firm of Fullerton & Knowles, P.C., for the admission *pro hac vice* of Michael Righetti, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2),

(iii) the relief requested in the Motion is in the best interest of the Debtors, their estates, and their creditors, (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary, and (v) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion, Therefore,

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is GRANTED.

2. Michael Righetti is permitted to appear *pro hac vice* as counsel to Counsel for Creditors Jonathon Card, Jack Hernandez, Robert Gentry, Joseph Skaf and all other persons similarly situated to each in the above-captioned chapter 11 cases in accordance with Local Bankruptcy Rule 2090-1(E)(2).

Dated: March \_\_\_\_, 2010

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**UNITED STATES BANKRUPTCY JUDGE**

I ASK FOR THIS:

/s/ Richard I. Hutson

Richard I. Hutson, Esq.

VSBS# 71097

Fullerton & Knowles, P.C.

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Clifton, VA 20124

(703) 818-2600

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Counsel for Creditors Jonathon Card, Jack Hernandez, Robert Gentry, Joseph Skaf and all other persons similarly situated to each.

**CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing Motion and proposed order have been endorsed by all necessary parties.

/s/ Richard I. Hutson

Richard I. Hutson, Esq.